

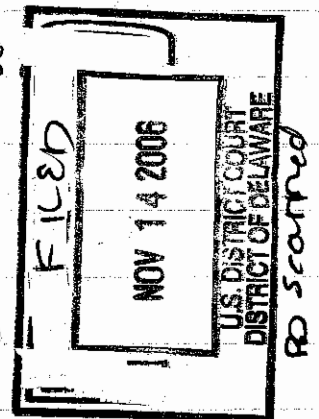
04-1205-SLR

NOVEMBER 9, 2006

In the United States District Court for the
 District Court for the District of Wilmington,
 Delaware Lock Box 18
 844 King Street
 Wilmington, Delaware 19801-3570

PETITION TO COURT TO OVERTUR
 SUMMARY OF JUDGMENT OF
 CIVIL SUIT:

TO: THE HONORABLE JUDGE SUE L. ROBINSON,
 MR. PETER T. DALLER, CLERK OF U.S.D.C.



The petitioner MR. Jeffrey alongs Simms, Have Supportive
 Cases in the above matter; The Supreme Court
 Have Suggested that when a single judge, rather than
 a legislature, declares a particular Sanction Civil
 or Criminal, a lesser degree of deference is required.
 Bagwell, 512 U.S. at 831-832; SEE U.S. V. Winter, 70
 F.3d 655, 660 (1st Cir. 1995) (Sanction neither clearly
 Civil nor Criminal; therefore, Sanction Vacated and case
 Remanded FOR Clarification of Nature of Sanction By
 District Court) Gregory V. Dept 896 Fd 31, 35 (3d Cir
 1990) ALSO SEE BUFFINGTON V. BALTIMORE COUNTY, 913 F.2d
 113, 133 (4th Cir 1990)

1 of 2 petition MR. Jeffrey alongs Simms #198625 unit 17
 Delaware Correctional Center 1181 Paddock Rd Smyrna, Del. 19977

MR. JEFFREY ALONZO SIMMS #198625
 DELAWARE CORRECTIONAL CENTER
 1181 PADDOCK ROAD
 SMYRNA, DELAWARE 19977

64-1205-SLR

([REDACTED])

*Petition To Overturn Summary Judgment
 In civil Suite*

NOVEMBER 9, 2006

HONORABLE CHIEF JUDGE SUE L. ROBINSON,
 CLERK OF U.S.D.C. MR. PETER T. DALLEO,
 IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF WILMINGTON,
 DELAWARE BLOCK BOX 18
 844 KING STREET (04-1205-SLR)
 WILMINGTON, DELAWARE 19801-3570

MR. Kendall Simms

43 DELAWARE AVE. #104
 HURLOCK, MARYLAND 21643

MS. Marie Simms

103 ROUTZAHN LANE
 FEDERALSBURG, MARYLAND

MS. Dannora Holden

21632
 311 8TH STREET
 LAUREL, DELAWARE
 19856.

HONORABLE JUDGE RICHARD F. STOKES,
 IN THE SUPERIOR COURT OF SUSSEX
 COUNTY DELAWARE (0207014771)
 JUDGES CHAMBERS
 P.O. BOX 746
 GEORGETOWN, DELAWARE 19947

(SUSSEX COUNTY)
 PUBLIC DEFENDERS OFFICE
 12 E. PINE STREET
 GEORGETOWN, DELAWARE 19947

(302-875-7085)

[REDACTED]

(410-754-7060)

(407-880-2604)

(410-228-7727)

MS. DONNA REBURTHER BURNS, M.D.
 CHIEF DOCTOR, DELAWARE DEPARTMENT OF
 CORRECTION P.O. BOX 500 GEORGETOWN,
 DELAWARE 19947
 MR. HARRY M. FREEMAN, SURGERY-ORTHOPEDIC
 808 MIDDLE ROAD
 SEAFORD, DELAWARE 19973
 MAJOR R.L. HUGES, LT. COL. THOMAS F. MACLEISH
 COL. L. ARRON CHAFFINCH
 DELAWARE STATE POLICE 1441 N. DUPONT HWY,
 DOVER, DELAWARE 19901;
 ATTORNEY GENERAL FOR THE STATE OF DELAWARE
 820 N. FRENCH STREET WILMINGTON,
 DELAWARE 19801 (MR. RALPH K. DURSTEIN 111)
 (CARL DAN BURGE)

(JA'RONDA, KEYUSHA)

[REDACTED]

(DANNORA HOLDEN)

1 of 2 To: the Honorable Judge Sue L. Robinson,
 please be advised because of the civil suite
 the correctional center have place me in adverse
 substantive consequence, please consider relocation
 of the petitioner
 your responds will be most appreciative

petitioner, Jeffrey A Simms #198625
 Delaware correction center unit 17
 1181 Paddock Rd Smyrna, Delaware 19977

DELAWARE DEPARTMENT OF CORRECTIONS
REQUEST FOR MEDICAL/DENTAL SICK CALL SERVICES
FACILITY: DELAWARE CORRECTIONAL CENTER

NOV. 9-2006

This request is for (circle one): MEDICAL DENTAL MENTAL HEALTH

JEFFREY X Simms

Name (Print)

SHU-17 Q-L-10

Housing Location

6-28-64

Date of Birth

198625

SBI Number

11-9-2006

Date Submitted

Complaint (What type of problem are you having)?

fracture Right HAND
Left and Right Knee painful and Swollen
Due to continual cold deprivation Cell
No Heat NO medication NEED motrilid 200 mg

Jeffrey Simms

Inmate Signature

11-9-2006

Date

The below area is for medical use only. Please do not write any further.

S:

O:

Temp: _____

Pulse: _____

Resp: _____

B/P: _____

WT: _____

A:

P:

E:

Provider Signature & Title

Date & Time

I/M JEFFREY Simms
SBI# 198625 UNIT 17
DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DELAWARE 19977

for

*The United States District Court for
the District of Wilmington*

Honorable Chief Judge Sue E. Robinson

Clerk of U.S.D. c MR. Peter T. Dallas

Box 18 844 KING STREET

Wilmington, Delaware

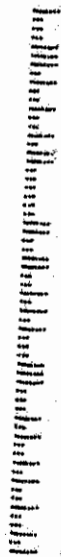
19861-3576

WILMINGTON DE 197

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U.S.M.S.